

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
	:	
v.	:	DATE FILED: _____
	:	
ROBERT HENDERSON	:	VIOLATIONS: 18 U.S.C. § 371
a/k/a “Omar”	:	(Conspiracy - 1 count)
GERALD SYDNOR	:	18 U.S.C. § 1344
MARTINA LUNDY	:	(Bank fraud - 1 count)

INFORMATION

(Conspiracy)

THE UNITED STATES ATTORNEY CHARGES THAT:

At all times material to this Information:

1. Defendants ROBERT HENDERSON (a/k/a “Omar”), GERALD SYDNOR and MARTINA LUNDY resided in Philadelphia, Pennsylvania. Defendants SYDNOR and LUNDY were married to each other and lived together as husband and wife.
2. First Union National Bank was a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation and had branch locations throughout the United States.
3. The School District of Philadelphia was the seventh largest in the nation with an enrollment of more than 200,000 students, an annual budget of more than \$1.5 billion, and more than 20,000 employees.

THE CONSPIRACY

4. From in or about March, 2001 through in or about September, 2002, in the Eastern District of Pennsylvania, and elsewhere, defendants

**ROBERT HENDERSON (a/k/a “Omar”),
GERALD SYDNOR,
and
MARTINA LUNDY**

conspired and agreed with each other and with others, known and unknown, to defraud First Union National Bank (“FUNB”) by assuming the identities of FUNB account holders and then depositing counterfeit checks into their bank accounts and making simultaneous cash withdrawals from the accounts, in violation of Title 18, United States Code, Section 1344.

5. As a result of this conspiracy and fraudulent scheme, more than \$300,000 worth of counterfeit checks were deposited into the bank accounts of at least 18 different victims at FUNB branch locations in Pennsylvania, New Jersey, Virginia, North Carolina, South Carolina, Georgia and Florida, resulting in fraudulent cash withdrawals and total losses to FUNB of more than \$200,000.

MANNER AND MEANS

6. Defendant ROBERT HENDERSON (a/k/a “Omar”) purchased stolen personal identification and bank account information of employees of the School District of Philadelphia and paid co-defendants GERALD SYDNOR and MARTINA LUNDY to use the stolen identities and bank accounts of the victims for the purpose of fraudulently obtaining money in the custody and control of First Union National Bank

It was a part of the conspiracy that:

7. Defendant ROBERT HENDERSON (a/k/a “Omar”) purchased the names, personal identifying information and bank account information of numerous employees of the School District of Philadelphia.

8. Defendant ROBERT HENDERSON (a/k/a “Omar”), with assistance from others known to the United States Attorney and others not yet identified, obtained counterfeit driver’s licenses in the names of his School District of Philadelphia employee victims and counterfeit checks made payable to the School District of Philadelphia employee victims whose identities he had unlawfully obtained.

9. Defendant ROBERT HENDERSON (a/k/a “Omar”) recruited defendants GERALD SYDNOR and MARTINA LUNDY to join the conspiracy and to assume the identities of the School District of Philadelphia employee victims.

10. Defendant ROBERT HENDERSON (a/k/a “Omar”) provided defendants GERALD SYDNOR and MARTINA LUNDY with fraudulent driver’s licenses in the victims’ names but which had SYDNOR’s and LUNDY’s photographs on them.

11. Defendant ROBERT HENDERSON (a/k/a “Omar”) provided defendants GERALD SYDNOR and MARTINA LUNDY with counterfeit checks made payable to the victims and directed SYDNOR and LUNDY to make what are known as “split deposits” into the accounts of the victims. Split deposits involved depositing the counterfeit checks into the victims’ bank accounts at FUNB and the simultaneous withdrawal of cash in amounts less than the full face value of the counterfeit checks.

12. Defendants ROBERT HENDERSON (a/k/a “Omar”), GERALD SYDNOR and MARTINA LUNDY traveled to FUNB branches throughout the Eastern United States for purposes of executing the scheme.

13. Defendant ROBERT HENDERSON (a/k/a “Omar”) paid defendants GERALD SYDNOR and MARTINA LUNDY approximately \$300 to \$700 for each fraudulent transaction that was successfully completed.

OVERT ACTS

In furtherance of the conspiracy and to accomplish its unlawful objects, the following overt acts, among others, were committed in the Eastern District of Pennsylvania, and elsewhere:

1. Between on or about March 12, 2001 and March 16, 2001, defendant ROBERT HENDERSON (“Omar”) provided to defendant GERALD SYDNOR the identity and bank account number of victim “J.N.,” a School District of Philadelphia employee, along with counterfeit checks made payable in the victim’s name and a phony Pennsylvania driver’s license in the name of the victim.

2. Between on or about March 12, 2001 and March 16, 2001, defendant GERALD SYDNOR, posing as victim “J.N.,” entered 5 different branches of FUNB in North Carolina and deposited counterfeit checks worth a total of approximately \$16,531.75 and made cash withdrawals totaling approximately \$11,500.

3. Between on or about May 7, 2001 and on or about May 11, 2001, defendant ROBERT HENDERSON (“Omar”) provided to defendant MARTINA LUNDY the identity and bank account number of victim “R.L.,” a School District of Philadelphia employee, along with

counterfeit checks made payable in the victim's name and a phony Pennsylvania driver's license in the name of the victim.

4. Between on or about May 7, 2001 and on or about May 11, 2001, defendant MARTINA LUNDY, posing as victim "R.L.," entered 5 different branches of FUNB at various locations in South Carolina and deposited counterfeit checks worth a total of approximately \$20,059.76 and made cash withdrawals totaling approximately \$16,500.

5. Between on or about May 7, 2001 and on or about May 14, 2001, defendant ROBERT HENDERSON ("Omar") provided to defendant MARTINA LUNDY the identity and bank account number of victim "J.G.," a School District of Philadelphia employee, along with counterfeit checks made payable in the victim's name and a phony Pennsylvania driver's license in the name of the victim.

6. Between on or about May 7, 2001 and on or about May 14, 2001, defendant MARTINA LUNDY, posing as victim "J.G.," entered 6 different branches of FUNB at various locations in South Carolina and deposited counterfeit checks worth a total of approximately \$24,031.23 and made cash withdrawals totaling approximately \$19,500.

7. Between on or about May 7, 2001 and on or about May 11, 2001, defendant ROBERT HENDERSON ("Omar") provided to defendant GERALD SYDNOR the identity and bank account number of victim "J.T.," a School District of Philadelphia employee, along with counterfeit checks made payable in the victim's name and a phony Pennsylvania driver's license in the name of the victim.

8. Between on or about May 7, 2001 and on or about May 11, 2001, defendant GERALD SYDNOR, posing as victim "J.T.," entered 5 different branches of FUNB in South

Carolina and deposited counterfeit checks worth a total of approximately \$19,879.90 and made cash withdrawals totaling approximately \$16,600.

9. Between on or about May 8, 2001 and on or about May 11, 2001, defendant ROBERT HENDERSON (“Omar”) provided to defendant MARTINA LUNDY the identity and bank account number of victim “M.D.,” a School District of Philadelphia employee, along with counterfeit checks made payable in the victim’s name and a phony Pennsylvania driver’s license in the name of the victim.

10. Between on or about May 8, 2001 and on or about May 11, 2001, defendant MARTINA LUNDY, posing as victim “M.D.,” entered 6 different branches of FUNB at various locations in South Carolina and deposited counterfeit checks worth a total of approximately \$24,186.30 and made cash withdrawals totaling approximately \$21,000.

11. Between on or about May 9, 2001 and on or about May 11, 2001, defendant ROBERT HENDERSON (“Omar”) provided to defendant GERALD SYDNOR the identity and bank account number of victim “R.H.,” a School District of Philadelphia employee, along with counterfeit checks made payable in the victim’s name and a phony Pennsylvania driver’s license in the name of the victim.

12. Between on or about May 9, 2001 and on or about May 11, 2001, defendant GERALD SYDNOR, posing as victim “R.H.,” entered 2 different branches of FUNB in South Carolina and deposited counterfeit checks worth a total of approximately \$7,663.52 and made cash withdrawals totaling approximately \$6,800.

13. Between on or about June 18, 2001 and on or about June 20, 2001, defendant ROBERT HENDERSON (“Omar”) provided to defendant GERALD SYDNOR the identity and

bank account number of victim “M.B.,” a School District of Philadelphia employee, along with counterfeit checks made payable in the victim’s name and a phony Pennsylvania driver’s license in the name of the victim.

14. Between on or about June 18, 2001 and on or about June 20, 2001, defendant GERALD SYDNOR, posing as victim “M.B.,” entered 3 different branches of FUNB in Florida and deposited counterfeit checks worth a total of approximately \$11,205.86 and made cash withdrawals totaling approximately \$9,650.

15. Between on or about June 18, 2001 and on or about June 25, 2001, defendant ROBERT HENDERSON (“Omar”) provided to defendant MARTINA LUNDY the identity and bank account number of victim “N.M.,” a School District of Philadelphia employee, along with counterfeit checks made payable in the victim’s name and a phony Pennsylvania driver’s license in the name of the victim.

16. Between on or about June 18, 2001 and on or about June 25, 2001, defendant MARTINA LUNDY, posing as victim “N.M.,” entered 7 different branches of FUNB at various locations in Florida and deposited counterfeit checks worth a total of approximately \$28,086.56 and made cash withdrawals totaling approximately \$22,500.

17. Between on or about June 19, 2001 and on or about June 21, 2001, defendant ROBERT HENDERSON (“Omar”) provided to defendant MARTINA LUNDY the identity and bank account number of victim “T.B.,” a School District of Philadelphia employee, along with counterfeit checks made payable in the victim’s name and a phony Pennsylvania driver’s license in the name of the victim.

18. Between on or about June 19, 2001 and on or about June 21, 2001, defendant MARTINA LUNDY, posing as victim “T.B.,” entered 4 different branches of FUNB at various locations in Florida and deposited counterfeit checks worth a total of approximately \$18,028.26 and made cash withdrawals totaling approximately \$10,500.

19. Between on or about June 19, 2001 and on or about June 22, 2001, defendant ROBERT HENDERSON (“Omar”) provided to defendant MARTINA LUNDY the identity and bank account number of victim “M.M.,” a School District of Philadelphia employee, along with counterfeit checks made payable in the victim’s name and a phony Pennsylvania driver’s license in the name of the victim.

20. Between on or about June 19, 2001 and on or about June 22, 2001, defendant MARTINA LUNDY, posing as victim “M.M.,” entered 4 different branches of FUNB in Florida and deposited counterfeit checks worth a total of approximately \$17,018.41 and made cash withdrawals totaling approximately \$13,500.

21. Between on or about June 22, 2001 and on or about June 25, 2001, defendant ROBERT HENDERSON (“Omar”) provided to defendant GERALD SYDNOR the identity and bank account number of victim “J.K.,” a School District of Philadelphia employee, along with counterfeit checks made payable in the victim’s name.

22. Between on or about June 22, 2001 and on or about June 25, 2001, defendant GERALD SYDNOR, posing as victim “J.K.,” entered 3 different branches of FUNB in Florida and deposited counterfeit checks worth a total of approximately \$12,968.46 and made cash withdrawals totaling approximately \$6,980.

23. Between on or about August 6, 2001 and on or about August 10, 2001, defendant ROBERT HENDERSON (“Omar”) provided to defendant GERALD SYDNOR the identity and bank account number of victim “B.T.,” a School District of Philadelphia employee, along with counterfeit checks made payable in the victim’s name and a phony Pennsylvania driver’s license in the name of the victim.

24. Between on or about August 6, 2001 and on or about August 10, 2001, defendant GERALD SYDNOR, posing as victim “B.T.,” entered 5 different branches of FUNB in Georgia and deposited counterfeit checks worth a total of approximately \$21,386.48 and made cash withdrawals totaling approximately \$10,800.

25. Between on or about August 8, 2001 and on or about August 9, 2001, defendant ROBERT HENDERSON (“Omar”) provided to defendant GERALD SYDNOR the identity and bank account number of victim “R.K.,” a School District of Philadelphia employee, along with counterfeit checks made payable in the victim’s name and a phony Pennsylvania driver’s license in the name of the victim.

26. Between on or about August 8, 2001 and on or about August 9, 2001, defendant GERALD SYDNOR, posing as victim “R.K.,” entered 4 different branches of FUNB in Georgia and deposited counterfeit checks worth a total of approximately \$17,480.41 and made cash withdrawals totaling approximately \$13,100.

27. Between on or about October 9, 2001 and on or about October 15, 2001, defendant ROBERT HENDERSON (“Omar”) provided to defendant MARTINA LUNDY the identity and bank account number of victim “E.B.,” a School District of Philadelphia employee,

along with counterfeit checks made payable in the victim's name and a phony Pennsylvania driver's license in the name of the victim.

28. Between on or about October 9, 2001 and on or about October 15, 2001, defendant MARTINA LUNDY, posing as victim "E.B.," entered 7 different branches of FUNB at various locations in New Jersey and deposited counterfeit checks worth a total of approximately \$30,477.95 and made cash withdrawals totaling approximately \$18,000.

29. Between on or about March 18, 2002 and on or about March 20, 2002, defendant ROBERT HENDERSON ("Omar") provided to defendant MARTINA LUNDY the identity and bank account number of victim "P.M.," a School District of Philadelphia employee, along with counterfeit checks made payable in the victim's name and a phony Pennsylvania driver's license in the name of the victim.

30. Between on or about March 18, 2002 and on or about March 20, 2002, defendant MARTINA LUNDY, posing as victim "P.M.," entered 2 different branches of FUNB in Virginia and Pennsylvania and deposited counterfeit checks worth a total of approximately \$7,229.85 and made cash withdrawals totaling approximately \$1,500.

31. Between on or about July 15, 2002 and on or about July 19, 2002, defendant ROBERT HENDERSON ("Omar") provided to defendant MARTINA LUNDY the identity and bank account number of victim "D.B.," a School District of Philadelphia employee, along with counterfeit checks made payable in the victim's name and a phony Pennsylvania driver's license in the name of the victim.

32. Between on or about July 15, 2002 and on or about July 19, 2002, defendant MARTINA LUNDY, posing as victim "D.B.," entered 4 different branches of FUNB in

Pennsylvania and deposited counterfeit checks worth a total of approximately \$13,932.46 and made cash withdrawals totaling approximately \$6,600.

33. On or about August 28, 2002, defendant ROBERT HENDERSON (“Omar”) provided to defendant MARTINA LUNDY the identity and bank account number of victim “A.L.,” a School District of Philadelphia employee, along with counterfeit checks made payable in the victim’s name and a phony Pennsylvania driver’s license in the name of the victim.

34. On or about August 28, 2002, defendant MARTINA LUNDY, posing as victim “A.L.,” entered a branch of FUNB in Lafayette Hill, Pennsylvania and deposited a counterfeit check worth approximately \$3,576.91 and made a cash withdrawal of \$3,000.

35. Between on or about September 9, 2002 and September 10, 2002, defendant ROBERT HENDERSON (“Omar”) provided to defendant MARTINA LUNDY the identity and bank account number of victim “G.J.,” a School District of Philadelphia employee, along with counterfeit checks made payable in the victim’s name and a phony Pennsylvania driver’s license in the name of the victim.

36. Between on or about September 9, 2002 and September 10, 2002, defendant MARTINA LUNDY, posing as victim “G.J.,” entered 2 different branches of FUNB in Pennsylvania and deposited counterfeit checks worth a total of approximately \$7,089.33 and made cash withdrawals totaling approximately \$1,950.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

(Bank Fraud)

THE UNITED STATES ATTORNEY CHARGES THAT:

1. Paragraphs 1-3 of Count One are incorporated here.
2. From in or about March, 2001 until in or about September, 2002, in the Eastern

District of Pennsylvania and elsewhere, defendants

**ROBERT HENDERSON (a/k/a “Omar”),
GERALD SYDNOR,
and
MARTINA LUNDY**

knowingly executed and attempted to execute a scheme to defraud First Union National Bank and to obtain money, funds and credits owned by and under the custody and control of this bank by means of false and fraudulent pretenses, representations and promises.

It was a part of the scheme that:

3. Paragraphs 6-13 (pages 2-4) of Count One are incorporated here.
4. Defendant MARTINA LUNDY assumed the identities of 11 different School District of Philadelphia employees and entered 48 different FUNB branches between Pennsylvania and Florida, depositing approximately \$193,717 worth of counterfeit checks into the victims’ bank accounts and making fraudulent cash withdrawals of approximately \$134,550.
5. Defendant GERALD SYDNOR assumed the identities of 7 different School District of Philadelphia employees and entered 27 different FUNB branches in North Carolina, South Carolina, Georgia and Florida, depositing approximately \$107,116 worth of counterfeit

checks into the victims' bank accounts and making fraudulent cash withdrawals of approximately \$75,430.

In violation of Title 18, United States Code, Section 1344.

PATRICK L. MEEHAN
United States Attorney